

EXHIBIT

"1"

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re: Terrorist Attacks on September 11, 2001 * Case No.: 03-md-1570 (MDL)
* (GBD) (SN)

This document relates to:

Marie Laure Anaya, et alii, vs. Islamic Republic of Iran (1:18-cv-12341) (GBD) (SN)

KATHLEEN MARIE DELATIZKY'S DECLARATION OF FAMILIAL RELATIONSHIP

I, Kathleen Marie Delatizky, hereby declare under penalty of perjury, as provided for by 28 U.S.C., § 1746, that the following statements are true and correct, namely:

1. My name is Kathleen Marie Delatizky, and I am the daughter of Donna M. Hall, who was the wife of Richard Bradway Hall, an insurance executive who died on 11 September 2001, while at work, when the World Trade Center collapsed. I submit respectfully this Declaration for the purpose of demonstrating that Richard Bradway Hall was the functional equivalent of my father.
2. While Richard Bradway Hall was not my biological father, for the reasons set forth below, my late stepfather, Richard Bradway Hall, should be deemed the functional equivalent of my father.
3. I was born in Jersey City, New Jersey, in 1982, and my biological father was Stuart Holster; however, when I was about two and a half years old, my parents separated, and the dissolution of their marriage was finalized in or about 1987. However, I continued to have visitation with my father every Wednesday evening and spent every other weekend with him throughout my childhood.
4. Richard Hall came into my life when I was 7 years old as he and my mother started dating. Right from the outset of their relationship, he was very good to my mother and to me; he

was very considerate towards both of us and brought much fun and levity into our lives.

5. At or about the time that Richard proposed marriage to my mother, he surprised and awestruck both of us by purchasing a beautiful home in Purchase, New York, where we went to live as a family immediately after the wedding, indicating that he chose Purchase, New York, because of its excellent public school system, and, in the middle of the third grade, I transferred to Purchase Elementary School, where I thrived, academically and socially.

6. Richard Bradway Hall and my mother were married, in Lyndhurst, New Jersey, on 15 December 1991, two weeks before my ninth birthday, and I was happily present at that blessed event; attached hereto, as "EXHIBIT 'A', is a copy of a photograph taken of me which my mother and Rick at the reception immediately following their matrimonial ceremony.

7. Richard Hall was the only father figure that I lived with fulltime growing up, and was a wonderful stepdad. He was patient, caring and funny, and never made me feel like he was trying to replace my father, which whom I have always been close. Rather, Rick became a second dad to me. He helped me with my school homework, watched TV with me in the evening, played board games with me, and teased me about how late I would sleep in as a teenager. He would take me into the office with me on "take your daughter to work day", and to see the Christmas tree at Rockefeller Center at Christmastime. I was always astonished at the length of his commute. When visiting his office at the World Trade Center, I remember looking out of his office window and being taken aback at the sight of all of the tiny people and cars far below us.

8. Rick took incredible care of me and my mom, and was always generous, supportive and encouraging. One example of this was when he learned that I was saving up one summer to buy a car, he astounded me by purchasing for me a used car and told me to use the money I had saved

for gas money. Another example is that he paid my full tuition to attend Maria Regina High School, where I was graduated as the class valedictorian in 2001. Still another was that it became a tradition for him to get tickets to see a Broadway show as a birthday present for me and I still think of him whenever I see a play. Richard's parents, who lived on Cape Cod, were another set of grandparents to me, and we would visit them on Cape Cod for a week, every summer, where we would enjoy going to the beach, going on whale watching tours, playing minigolf, getting ice cream, and playing cards as a family every night.

9. Rick died a few weeks after I left home for my freshman year of college at the University of Massachusetts – Amherst. I will forever remember the very last time that I saw him, just as I was departing to travel to Amherst; we hugged and he said: “I’ll see you Columbus Day weekend!” Losing him has absolutely and enduringly devastated me. I continue to think of him often and of all of the things in my life he has missed. I missed him when I received my undergraduate, baccalaureate degree from the University of Massachusetts, in 2005, and when I received my Masters Degree in Social Work, from Fordham University, in 2010. I missed him at my wedding in 2014 (where, incidentally, I assumed my married name, namely, Kathleen Marie Delatizky), and now have two little girls who will never know one of their grandparents. I know just how much they are missing out on by not getting the opportunity to know him as I realize how Rick was a wonderfully grounding presence in my life and helped to give me a beautiful childhood. Rick shaped the person I have become and was an exceptional example of what a husband and father should be. I am forever grateful that he was my stepdad and I will always miss him dearly.

10. Before closing out this Declaration, I would like to add a sampling of some family photographs and other memorabilia demonstrating my cherished close and wonderful

relationship with my late stepfather, Richard Bradway Hall.

11. Attached hereto as "EXHIBIT 'B'" are two photographs, the first being a picture of me with my step-brother Shawn, Rick and my mom, taken at Christmas, 1992, and the latter being a picture of me with Rick and my stepbrother, Shawn, while on a Cape Cod whale watch in the summer of 1995;

12. Attached hereto as "EXHIBIT 'C-1'" & "EXHIBIT 'C-2'" is a copy of the birthday card that I gave to Rick, on his birthday, in 1993.

13. Attached hereto as "EXHIBIT 'D'" are a labeled photograph of me, with Rick, my stepbrother, Shawn, and our dog, Samantha, and a labeled photo of me, my mom and our dog, Samantha, taken at Easter, 1997.

14. Attached hereto as "EXHIBIT 'E'" is an anniversary card that I made for my mom and Rick in 1994;

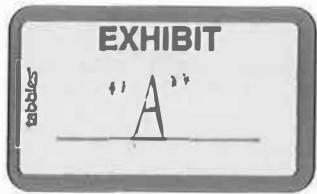
15. Attached hereto as "EXHIBIT 'F'" are two photographs, the first being a picture of me with Rick and my mom, taken at my Aunt Ellen's wedding, in October of 1997, and the latter being a Polaroid picture at Christmas with Rick's family -- included in this picture are me, my Uncle Doug (Rick's brother), my step-grandparents, Ruth & Herman, Rick & my mom, and our dog, Samantha. I am not sure what year this was, but believe it was somewhere between 1997 and 1999.

16. Attached hereto as "EXHIBIT 'G'" is picture of a birthday card that I received from Rick at some point in my mid-teen years, and attached hereto as "EXHIBIT 'H'" is a copy of Richard Hall's obituary, which was published in the Newark, New Jersey Star-Ledger, on 17 October 2001. I have added this obituary to my Declaration as it contains references to Rick's devotion to me, which sentiments were more than reciprocated by me towards him.

I, Kathleen Marie Delatizky, undersigned, hereby declare, under the penalty of perjury, that
the foregoing is accurate, true and correct.

Dated: 8|31|2023


KATHLEEN MARIE DELATIZKY



Me, Mom and Rick at their wedding, 12/15/91

EXHIBIT

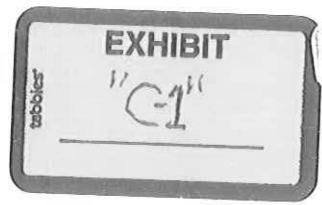
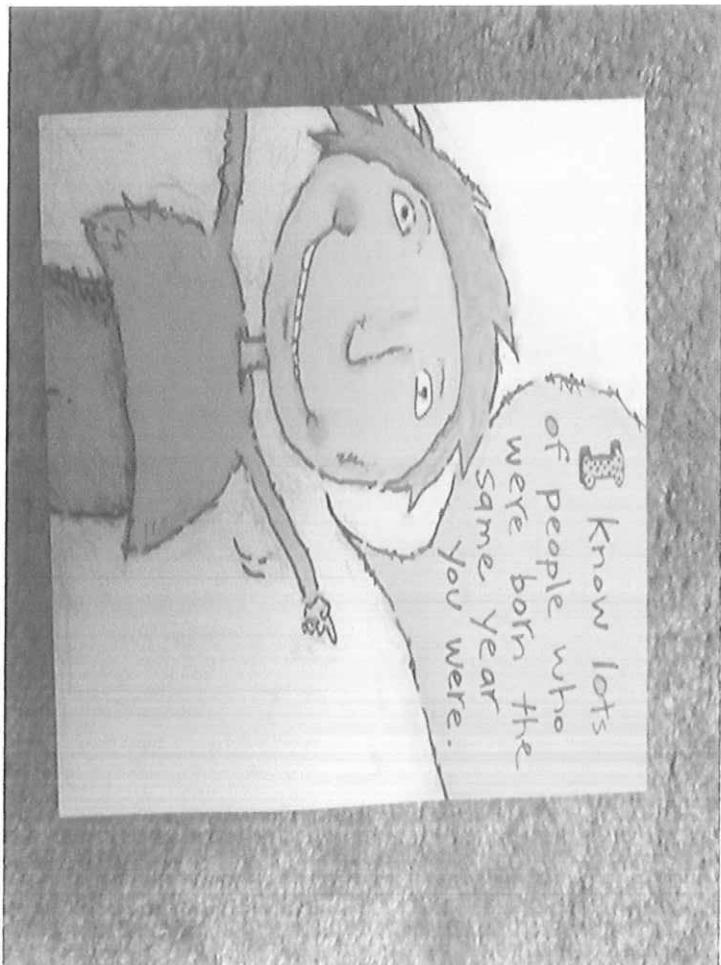
"B"



Christmas, 1992



Another Cape Cod whale watch, Summer 1995



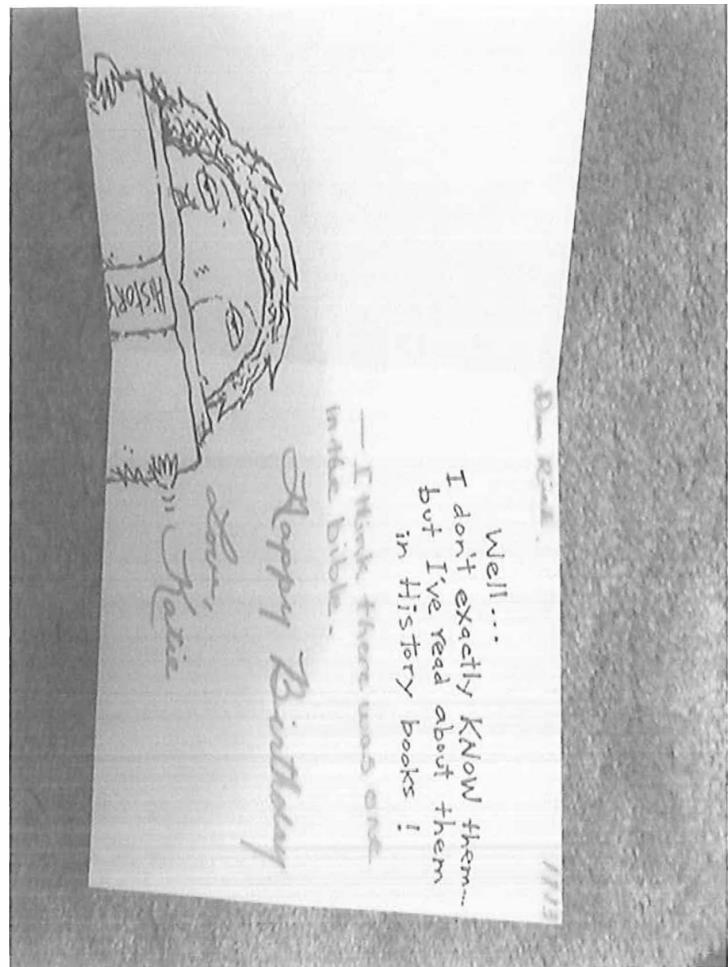
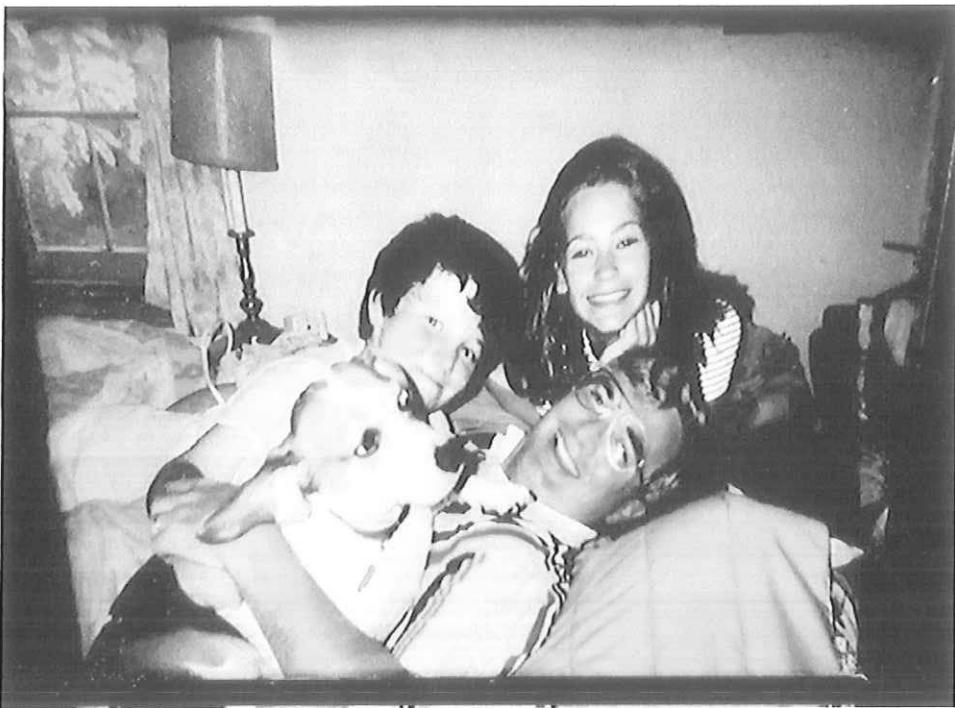
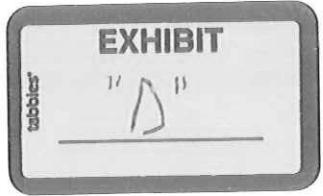


EXHIBIT
"C-2"

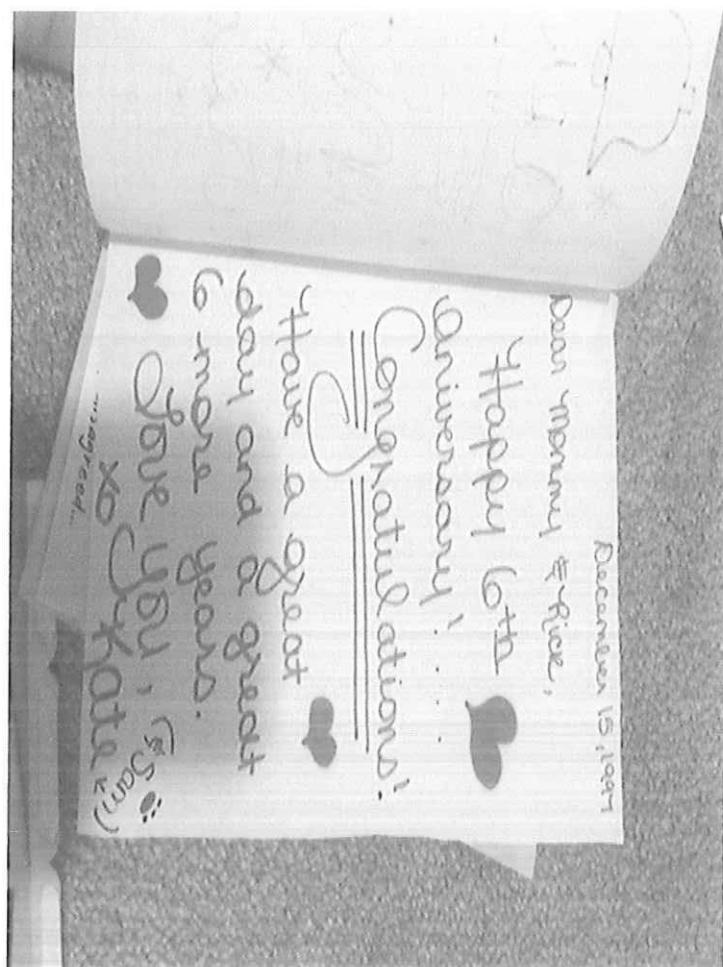


Summer 1998, with our dog Samantha



Easter, 3/29/97

CARDS:

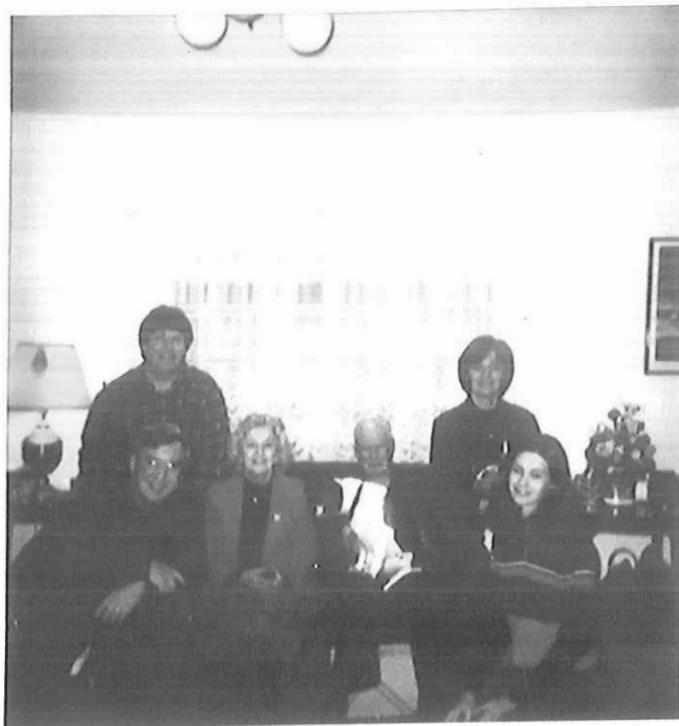


This is an anniversary card I made them when I was 14 years old

Some birthday cards we gave to each other, we liked to tease and usually got funny cards:



Rick, me, Mom at my Aunt Ellen's wedding, 10/4/97



A Polaroid from Christmas with Rick's family (his brother my Uncle Doug, my step-grandparents Ruth and Herman and me, Rick, mom and our dog Samantha). Not sure of the year somewhere between 97-99.

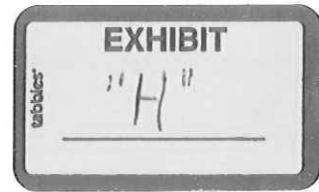
EXHIBIT

"6"

SEARCHED

Dear little
I am sorry
Lovingly yours
John

If you choose -
If you choose -
A. (a coke) It means
you are practical.
You are satisfied
with the barest
essentials of life.
B. (a present) It means
you are optimistic
and you enjoy surprises.
C. (money) Indicates you
are highly imaginative.
You believe in the
impossible! Like
opening this card
and finding money in it.
D. (a card) This shows
you are a realist.
You don't expect too
much, and in this
case, you were not
disappointed.



THE STAR-LEDGER

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Richard B. Hall

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Richard Hall Obituary

Nights With Shawn

Richard B. Hall liked to tell his wife, Donna, that life was good. "'I'm a happy guy'; that's what he used to always say to me," she said.

At 49, he was a senior vice president at the Aon Corporation, enjoying work, staying in shape by shooting hoops and playing golf with such dedication that he dreamed of one day joining the senior pro tour.

But his greatest joy came from his family. His son, Shawn, 15, from a previous marriage, was "the light of his life," Mrs. Hall said.

Mr. Hall would pick up his son once a week and bring him home to Purchase, N.Y., for dinner and television. He called the evenings with his son his "Shawn nights," said Al Willbee, who considered Mr. Hall his best friend. "You couldn't get him to break those appointments for the life of you," Mr. Willbee said. Mr. Hall regularly took his son to see his grandparents, Ruth and Herman Hall.

Mr. Hall was devoted to his stepdaughter, Katie Holster, Mrs. Hall's daughter from her first marriage. He talked about her so much that people were surprised to learn that she was not his own daughter.

As Ms. Holster progressed through high school, Mr. Hall would tell his wife not to worry about college expenses, because wherever she wanted to go, they would find the money for it. When it came to what he would do for his stepdaughter, "the sky was the limit," Mrs. Hall said.

In June, Ms. Holster was her high school's valedictorian. Mr. Hall, his wife recalled, said jokingly, "I wish I could take credit for her brains, but I can't."

Published by The Star-Ledger on Oct. 17, 2001.



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Hall Pages

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